

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

CHUCK STREBLOW, KRISTEN
ROZMIAREK, KIMBERLY HERNANDEZ,
IMAGINATION INDUSTRIES, INC. dba
THE AMERICAN DREAM BAR, CASEY
ROWE; SARAH HOUSTON, JANE DOE
DANCERS #1 – 25, JOHN DOE SECURITY
GUARDS #1 – 7, JOHN & JANE DOE
CUSTOMERS #1 – 100 and all similarly
situated residential & commercial neighbors
of Club 180,

Plaintiffs,

v.

CLUB 180, AM314, LLC, IRISHMEN 180,
LLC, TOAST, INC., MATTHEW
LONGCOR, AYDEN LONGCOR, ERIC
HAVERMANN, NICHOLAS SCALISE dba
DJ NEXT1, MIROSLAVA KOTSAN,
JAMES PULL, DAVID EKDAHL, ELLIE
JAEKE, MARLEY NYGAARD, BLAIKE
KOCA, JESSICA RICHARDSON, BROOKE
LEIBERT, BREAUANA HOFFMAN,
TEAONA MASON, LANIE WILSON,
KATHERINE TEDI SMITH, PATIENCE
ELIZABETH, ELENA RHODD-MORALES,
CHRISTINA CRAFT, BRITTNEY DINOVO,
KIARA MORALES, TANEA WHITE,
SKYLAR DICKY, JANAE BALT, A.
JANSEN aka PERSUSIA, AMIRA,
OCTAVIA, JESSIE, SANTANA, SAPPHIRE,
WINTER, MIREYA, TINY, ECHO, EVRON,
INC., 7 OAKS INVESTMENT CORP.,
HIGHLAND ASSOCIATES, INC., CTS,
LLC, NANCY WAGGENER, PAUL
WAGGENER, VODOO LOUNGE, INC.,
KYRON O'BRIEN, BRAVO1 SECURITY,
INC., MICHAEL ELAYAN, STU SLEEPER
aka STUPAC X, JALIL TOOKHI, MALIK
HARMON, ABDUL RAHMANZAI, DAVID
LOOLOO, TONY PHAM, BREANNA
PHAM-CARR, THROWBACK EMPIRE,

Case No. 8:25-cv-00241

**DEFENDANT JAMES PULL'S
MOTION TO DISMISS**

LLC dba KRUSH ULTRA LOUNGE, IVON
PENNY, CHAD, ROMAN and JOHN &
JANE ROES #1– 50,

Defendants.

Defendant James Pull (“Defendant”), pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), by and through his counsel of record, hereby moves the Court for an Order dismissing Plaintiffs Chuck Streblow, Kristen Rozmiarek, Kimberly Hernandez, Imagination Industries, Inc. dba The American Dream Bar, Casey Rowe, Sarah Houston, Jane Doe Dancers 1-25, John Doe Security Guards 1-7, and John and Jane Doe Customers 1-100’s (collectively hereinafter, “Plaintiffs”) Amended Class Action Complaint (“Amended Complaint”) for failure to state a claim upon which relief can be granted on all claims and for lack of subject matter jurisdiction. Defendant has submitted a Brief in Support of this Motion to Dismiss.

WHEREFORE, Defendant James Pull respectfully requests that the Court enter an Order, dismissing Plaintiffs’ Amended Complaint and the claims alleged against him, with prejudice.

Dated this 27th day of May, 2025.

JAMES PULL, Defendant,

By: /s/ Ryan M. Kunhart
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Attorneys for Defendant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 27, 2025, the foregoing document was electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification to all CM/ECF participants.

/s/ Ryan M. Kunhart

Ryan M. Kunhart